

1 TREVOR J. HATFIELD, ESQ  
2 Nevada Bar No. 7373  
3 HATFIELD & ASSOCIATES, LTD.  
4 703 S. Eighth Street  
5 Las Vegas, Nevada 89101  
6 Telephone: (702) 388-4469  
7 Facsimile: (702) 386-9825  
8 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
9 Attorney for Plaintiff In conjunction with Legal Aid Center of  
10 Southern Nevada Pro Bono Project

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 LUIS CERVANTES,  
14 Plaintiff,

15 vs.

16 EDDIE SCOTT, et al.,  
17 Defendants.

CASE NO: 2:17-cv-00562-MMD-DJA

18 **STIPULATION AND ORDER TO EXTEND**  
19 **TIME FOR PLAINTIFF TO RESPOND TO**  
20 **DEFENDANT ALLAN KIRKWOOD,**  
21 **D.D.S.'S MOTION FOR SUMMARY**  
22 **JUDGMENT**  
23 **(Third Request)**

24 COMES NOW, Plaintiff Luis Cervantes ("Plaintiff"), by and through his counsel, the law  
25 firm of Hatfield & Associates, Ltd., appearing *pro bono publico*, and Defendant Allan  
26 Kirkwood, D.D.S. ("Defendant Kirkwood") by and through his counsel, the law firm of Lewis  
27 Brisbois Bisgaard & Smith, LLP, hereby stipulate and agree to extend the time for Plaintiff to  
28 Respond to Defendant Allan Kirkwood, DDS's Motion for Summary Judgment (ECF #81). This  
request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the party's third  
request for an extension of time for Plaintiff to respond to Defendant's Motion for Summary  
Judgment.

Good cause exists for this extension, as the current coronavirus/COVID-19 pandemic has  
caused, and continues to cause, disruption to the practices of counsel involved in this case. In  
addition, Plaintiff is incarcerated in Ely State Prison and Plaintiff's Counsel has had difficulty  
communicating with him to formulate an opposition to Defendant's Motion for Summary Judgment.

1 In addition, Plaintiff's Counsel requests additional time so the parties may potentially explore  
2 resolution. This request is also made due to Plaintiff's counsel having a need for additional time and  
3 Defendant has courteously granted this extension of time to file Plaintiff's Response.

4 Accordingly, Plaintiff shall have up to and including July 24, 2020, to respond to  
5 Defendant Allan Kirkwood, DDS's Motion for Summary Judgment (ECF #81).

6 DATED this 15<sup>th</sup> day of July, 2020

7  
8 **HATFIELD & ASSOCIATES**

9 */s/ Trevor J. Hatfield*

10 By: \_\_\_\_\_  
11 Trevor J. Hatfield, Esq. (SBN 7373)  
12 703 S. Eighth Street  
13 Las Vegas, Nevada 89101  
14 Tel: (702) 388-4469  
15 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
16 *Attorney for Plaintiff In conjunction with*  
17 *Legal Aid Center of Southern Nevada Pro*  
18 *Bono Project*

**LEWIS BRISBOIS BISGAARD & SMITH,  
LLP**

*/s/ Katherine J. Gordon*

By: \_\_\_\_\_  
S. Brent Vogel, Esq. (SBN 6858)  
Katherine J. Gordon, Esq. (SBN 5813)  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
Tel.: (702) 893-3383  
Email: [Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)  
Email: [Katherine.Gordon@lewisbrisbois.com](mailto:Katherine.Gordon@lewisbrisbois.com)  
*Attorneys for Defendant Allan Kirkwood, DDS*

**ORDER**

22 **IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

Dated: July 16, 2020

HATFIELD & ASSOCIATES, LTD.  
703 8<sup>th</sup> Street \* Las Vegas, Nevada 89101  
Telephone (702) 388-4469